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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,

Plaintiff,

VS.

GUILLERMO ZAVALA-
RODRIGUEZ,

Defendant.

Case No. 2:20-mj-00548-DJA

**STIPULATION FOR CONTINUANCE OF
PRELIMINARY HEARING**

The parties, by and through Nicholas A. Trutanich, United States Attorney, and Jennifer J. Oxley, Assistant United States Attorney, counsel for the United States of America, and Rene L. Valladares, Federal Public Defender, and Andrew Wong, Assistant Federal Public Defender, counsel for Guillermo Zavala-Rodriguez, hereby stipulate to a continuance of the preliminary hearing scheduled in this case for September 25, 2020, pursuant to Federal Rule of Criminal Procedure 5.1(c) and (d). This stipulation is based on the following reasons:

1. This case has been assigned to the Honorable Judge Navarro, in Case No. 20-cr-00256-GMN-VCF.
2. The parties have reached a plea agreement in this case, and a change of plea hearing is scheduled for October 7, 2020.

1 3. The defendant has signed a waiver of indictment, which has been provided in
2 Case No. 20-cr-256, and has agreed to plea to an Information, which has been filed in the same
3 case.

4 4. The parties request that the Court continue the preliminary hearing scheduled in
5 this case for at least 30 days.

6 5. The parties agree that the additional time should be excludable as to the
7 computing time within which an indictment must be filed and the time that trial must
8 commence, both pursuant to the Speedy Trial Act, Title 18 United States Code, Section 3161 ,
9 considering the factors under Title 18, United States Code, Section 3161(h)(7)(A)-(B).

10 6. The defendant is currently detained in custody and does not object to this request.

11 7. Denial of this request could result in a miscarriage of justice, and the ends of
12 justice served by granting this request outweigh the best interest of the public and the defendant
13 in a speedy trial.

14 DATED: September 22, 2020.

15 NICHOLAS A. TRUTANICH
16 United States Attorney

17 /s/ Jennifer J. Oxley
18 JENNIFER J. OXLEY
19 Assistant United States Attorney
20 District of Nevada

21 /s/ Andrew Wong
22 Andrew Wong
23 Assistant Federal Public Defender
24 Attorney for Defendant Guillermo Zavala-
Rodriguez

UNITED STATES DISTRICT COURT
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Order

Based on the Stipulation between the defense and the government, and good cause appearing therefore, the Court hereby finds and orders as follows:

1. Pursuant to Federal Rule of Criminal Procedure 5.1(d) and for good cause shown, the preliminary hearing scheduled in this case for September 25, 2020, shall be continued until October 27, 2020 at 4:00 p.m. in Courtroom 3A.
2. The parties agree to this continuance.
3. The defendant is in custody and does not object to the continuance.
4. The continuance is not sought for the purposes of delay.
5. By the stipulation of the parties, the time is excludable in computing time within which an indictment must be filed and the time that trial must commence, both pursuant to the Speedy Trial Act, Title 18 United States Code, Section 3161, considering the factors under Title 18, United States Code, Section 3161(h)(7)(A)-(B).

DATED this 23rd day of September 2020.



UNITES STATES MAGISTRATE JUDGE